

Serial No. 09/366,678

Attorney Docket No. 113335C

REMARKS

Claims 1-11 and 23-46 remain in the application. These claims stand rejected as unpatentable over Borella.

Claims 1 and 2 have been amended to recite that the translation of the source address is such that "no portion of the source address can be determined from the translated source address." Claim 2 has been further amended to recite that the translation of the destination address is such that "no portion of the destination address can be determined from the translated destination address."

Amended claims 1 and 2 thus distinguish the invention from Borella in that the source and destination addresses in Borella—e.g., source address 198.10.20.30 of router 26—are contained in the packets transmitted across the network. Therefore, contrary to applicants' claims, the source and destination addresses in Borella can be determined from the translated versions thereof.

It is true that the local addresses in Borella, e.g., 10.0.0.1, are not contained in the translated addresses. However, claims 1 and 2 specifically limit the recited source and destination addresses as being addresses "on said public network." The local addresses, e.g., 10.0.0.1 in Borella are internal to Borella's SOHO LAN. Thus packets containing those local addresses never make it through router 26 onto the public network. Thus Borella's local addresses cannot be said to correspond to the addresses recited in these claims.

With respect to the other claims remaining in the application—claims 3-11 and 23-46—applicant urges that the examiner consider the analysis presented by applicants in their amendment of 03/24/2003 relative to these claims.

In particular, it is noted that the recitations of claim 3, for example, involve six different addresses: first and second source addresses, first and second destination addresses and first and second global addresses. In the Office action of 11/27/2002, the rejection of claim 3 did not provide any indication as to which addresses in Borella were regarded by the examiner as corresponding to which of the six addresses recited in

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applicants' claims. Rather, in rejecting this claim, the Office action of 11/27/2002 simply pointed to large blocks of text in Borella.

Applicants are certainly not interested in arguing for allowance of a claim that reads on the prior art. Thus in an earnest effort to see if there was any way in which the recitations of claim 3 could be made to read on Borella, the undersigned spent considerable effort—at significant expense to the assignee AT&T—in trying line up the recitations of claim 3 with the teachings in Borella. Applicants undertook to see the rejection in a light most unfavorable to applicants—that is, to see it the examiner's way in order to discover if there was any way in which claim 3 with all of its limitations taken into account could be found to read on Borella.

The results of that analysis were presented in applicants' amendment of 03/24/2003 as painstakingly and carefully as the undersigned attorney was capable of doing in an effort to demonstrate applicants' conclusion that no matter how one tries to find a correspondence between the recitations in claim 3 and the various addresses in Borella, there was no way that the claim as a whole, taking into account all of its recitations, could be found to read on Borella.

The analysis presented by applicants in their amendment of 03/24/2003 was not addressed in the most recent Office action of 06/03/2003. Nor was there a response to applicants' request that the examiner point out with specificity—rather than general references to large blocks of text—which addresses and/or apparatus or method steps in Borella are deemed to anticipate the recitations of applicants' claims 3-11 and 23-46.

It is believed that applicants should be provided with a response to their analysis relative to claims 3-11 and 23-46. More particularly, it is believed that it is incumbent upon the examiner to indicate the basis on which the examiner finds applicants' analysis relative to those claims unpersuasive. To repeat, applicants' believe that have showed in their amendment of 03/24/2003 how it is not possible for the addresses and address interrelationships in claim 3, and the other claims in the application, to be lined up with the Borella disclosure. If that analysis is believed to be incorrect, it is believed that applicants ought to be afforded some indication as to why.

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Applicants thus continue to urge that claims 3-11 and 23-46 are allowable. Applicants further urge that claims 1 and 2, as amended, are also allowable, for the reasons set forth hereinabove.

Reconsideration is requested and passage of the application to issue are earnestly solicited.

Respectfully submitted,

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